

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

EUFEMIA GUILLEN,

Plaintiff,

vs.

B.J.C.R. L.L.C., a Nevada Limited Liability  
Company; B.J.H.S., LLC., a Nevada Limited  
Liability Company; R.C.S.J., LLC, a Nevada  
Limited Liability Company; Dhilan One  
L.L.C., a Nevada Limited Liability  
Company; CHAMPAK LAL, an Individual;  
and BHARAT B. LAL, an Individual,

Defendants.

Case No.: 3:20-cv-317-ART-CSD

**ORDER GRANTING**  
**STIPULATION EXTENDING**  
**DEADLINE TO FILE JOINT**  
**PRETRIAL ORDER [Third**  
**Request]**

Plaintiff Eufemia Guillen (“Plaintiff” or “Guillen”) and Defendants B.J.C.R. L.L.C., B.J.H.S., LLC., R.C.S.J., LLC, CHAMPAK LAL, and BHARAT B. LAL (collectively “Defendants”), by and through their respective counsel, hereby stipulate and request that the current deadline of August 15, 2024, by which to file the Parties’ Joint Pretrial Order (“JPTO”) be briefly extended one final time by one (1) week due to unexpected events related to the undersigned defense counsel’s parents’ planned visit to Reno. More specifically, the undersigned defense counsel’s parents arrived in Reno from Pennsylvania unexpectedly late (after midnight) on August 9<sup>th</sup> due to multiple travel delays and required assistance at and transportation from the airport. Plaintiff’s counsel provided defense counsel with Plaintiff’s portions of the JPTO on the morning of August 13<sup>th</sup>. The undersigned defense counsel promptly reviewed and continued working on the JPTO draft

but had limited time to do so due to plans with her children and parents on her parents' final day of their visit to Reno. The undersigned defense counsel anticipated being able to complete the remaining portions of the JPTO by the morning of August 14<sup>th</sup> and also having sufficient time to confer with Plaintiff's counsel regarding the Parties' proposed exhibits and estimated length of trial before the August 15<sup>th</sup> deadline. However, the undersigned defense counsel's parents' flight on August 14<sup>th</sup> was significantly delayed thereby resulting in the rescheduling of their flight for August 15<sup>th</sup> and impeding the undersigned defense counsel's availability to complete the JPTO and confer with Plaintiff's counsel before the submission deadline.

Additionally, Plaintiff's counsel, Mr. Kemp, is presently traveling on a long pre-planned, prepaid, cruise vacation in Japan (which involves a 16-hour time difference from Nevada). While Mr. Kemp works at least a few hours a day while traveling, some of the issues that have arisen, which while foreseeable were not immediately and previously recognized, will require review of paper documents in Plaintiff's hard file in the office and that review will not be able to be completed until Plaintiff's counsel returns to the office on August 20, 2024. Additionally, Plaintiff's counsel, Ms. Gallagher, is working on figuring out the logistics of obtaining some documents and evidence from the criminal trial of Defendant Champak Lal that appear to be in the possession of the Nevada state court in Elko, County or in the possession or control of the Elko County District Attorney's office and this is taking longer than expected as the attorney in that office that tried the criminal case has been in court this week and unavailable.

Nevertheless, counsel for the Parties are confident that no further extensions will be necessary and they will be able to complete and submit the JPTO by no later than August 22, 2024. This is the third request for an extension of the JPTO deadline. However, the request is made in good faith and is not for the purpose of delay.

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1 Accordingly, the Parties stipulate and respectfully request that the Court grant this final extension of  
2 time to submit the JPTO.

3 DATED this 15<sup>th</sup> day of August 2024.

DATED this 15<sup>th</sup> day of August 2024.

4 KEMP & KEMP, ATTORNEYS AT LAW

SIMONS HALL JOHNSTON PC

5 /s/ James P. Kemp

/s/ Sandra C. Ketner

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12 **ORDER**

13 IT IS SO ORDERED.

14 DATED this 19th day of August, 2024.

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16 ANNE R. TRAUM  
17 UNITED STATES DISTRICT JUDGE  
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